

EXHIBIT 7

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

MELODY JOY CANTU and DR.)
RODRIGO CANTU,)
)
Plaintiffs,)
) CIVIL ACTION
VS.)
) NO.: 5:20-CV-00746-JKP
DR. SANDRA GUERRA and) (HJB)
DIGITAL FORENSICS)
CORPORATION, LLC,)
)
Defendants.)

ORAL AND VIDEOTAPED DEPOSITION OF

MELODY JOY CANTU

(VIA ZOOM)

JULY 16, 2022

ORAL AND VIDEOTAPED DEPOSITION OF MELODY JOY CANTU,
produced as a witness at the instance of the DEFENDANT,
and duly sworn, was taken in the above-styled and
numbered cause on July 16, 2022 from 9:06 o'clock a.m.
to 2:17 o'clock p.m., Via Zoom, before
DEBBIE S. LONGORIA, CSR in and for the State of Texas,
reported by machine shorthand, pursuant to the Federal
Rules of Civil Procedure.

A P P E A R A N C E S

FOR THE PLAINTIFFS:

TOR EKELAND (Via Zoom)
TOR EKELAND LAW, PLLC
30 WALL STREET, 8TH FLOOR
NEW YORK, NEW YORK 10005
(718) 737-7264
tor@torekeland.com

FOR THE DEFENDANTS DR. SANDRA GUERRA and DIGITAL
FORENSICS CORPORATION, LLC:

BRANDY C. PEERY (Via Zoom)
RICARDO G. CEDILLO (Via Zoom)
DAVIS, CEDILLO & MENDOZA, INC.
755 E. MULBERRY, SUITE 250
SAN ANTONIO, TEXAS 78212
(210) 822-6666

ALSO PRESENT:

KYLE LABYER, Videographer (Via Zoom)
KATHLEEN N. FOLKS (Via Zoom)
DR. RODRIGO CANTU (Via Zoom)
DR. SANDRA GUERRA (Via Zoom)
NICOLE GUITELMAN (Via Zoom)

1 Q. And where does she live?

2 A. In Houston.

3 Q. What are the names of the attorneys who are
4 representing you in this case?

09:34 5 A. In this case?

6 MR. EKELAND: Objection.

7 THE WITNESS: I believe you can reference
8 the cover sheet of the sheet you showed me as Exhibit 1.

9 MS. PEERY: Objection, nonresponsive.

09:34 10 Q. (By Ms. Peery) What are the names of the
11 attorneys who are representing you in this case?

12 A. Tor --

13 MR. EKELAND: Objection.

14 THE WITNESS: Tor Ekeland.

09:35 15 Q. (By Ms. Peery) Who else?

16 A. Rain Minns.

17 Q. Who else?

18 A. I believe Mike Hazzard.

19 Q. Hazzard, Mike Hazzard, H-a-z-z-a-r-d?

09:35 20 A. I believe that's correct.

21 MR. EKELAND: It's H-a-s-s-a-r-d.

22 Q. (By Ms. Peery) Did you sign an Engagement
23 Agreement with Mr. Ekeland and his firm?

24 A. Yes, I did.

09:35 25 Q. Okay. Did you sign an Engagement Agreement

1 with Ms. Minns and her firm?

2 A. I believe I did. I don't remember. It was in
3 2019.

4 Q. How are you paying your attorneys?

09:35 5 A. Bank wire.

6 Q. Do you pay them hourly?

7 A. No.

8 Q. How do your -- how do your attorneys charge
9 you for the services they're providing to you, is it
09:36 10 hourly --

11 MR. EKELAND: Objection.

12 Q. -- or is it a contingency?

13 MR. EKELAND: Objection.

14 THE WITNESS: It's --

09:36 15 MR. EKELAND: You can answer.

16 THE WITNESS: I -- I have had to refill
17 my retainer multiple times and it is not hourly and it
18 is not a contingency.

19 Q. (By Ms. Peery) So, they do not charge you by
09:36 20 the hour?

21 MR. EKELAND: Objection.

22 THE WITNESS: I -- I don't go through the
23 statements and look. I see a lot of very detailed
24 billing and I trust my attorney, so I pay him.

09:36 25 Q. (By Ms. Peery) I'm trying to -- you've made a

1 claim for attorneys' fees in this case and I'm trying to
2 understand the basis for that claim.

3 A. It's a lot.

4 Q. Do you pay your -- your attorney -- is your
09:37 5 arrangement with your attorney to pay him a flat fee or
6 does he charge by the hour?

7 MR. EKELAND: Objection. You can answer.

8 THE WITNESS: It is not a flat fee.

9 Q. (By Ms. Peery) Okay. So, he charges by the
09:37 10 hour?

11 MR. EKELAND: Objection.

12 THE WITNESS: I don't know his billing.

13 Q. (By Ms. Peery) Okay. But, ma'am, you did sign
14 an Engagement Agreement, did you not?

09:37 15 MR. EKELAND: Objection.

16 THE WITNESS: I did. I signed it three
17 years ago and I don't remember what it says.

18 Q. (By Ms. Peery) How much does your attorney
19 charge an hour?

09:37 20 MR. EKELAND: Objection.

21 THE WITNESS: I don't -- I don't
22 remember.

23 Q. (By Ms. Peery) Everything that's made the
24 basis of your lawsuit appears to have occurred in San
09:37 25 Antonio. How is it that you happened to retain an

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REPORTER'S CERTIFICATION
DEPOSITION OF MELODY JOY CANTU
JULY 16, 2022

I, Debbie S. Longoria, Certified Shorthand Reporter
in and for the State of Texas, hereby certify to the
following:

That the witness, MELODY JOY CANTU, was duly sworn
by the officer and that the transcript of the oral
deposition is a true record of the testimony given by
the witness;

I further certify that pursuant to FRCP Rule 30(f)
(1) that the signature of the deponent:

_____ was requested by the deponent or a party before
the completion of the deposition and returned within 30

1 days from date of receipt of the transcript. If
2 returned, the attached Changes and Signature Page
3 contains any changes and the reasons therefor;

4 X was not requested by the deponent or a party
5 before the completion of the deposition.

6 I further certify that I am neither attorney nor
7 counsel for, related to, nor employed by any of the
8 parties to the action in which this testimony was taken.

9 Further, I am not a relative or employee of any
10 attorney of record in this cause, nor do I have a
11 financial interest in the action.

12 Subscribed and sworn to on this the 28th day
13 of July, 2022.

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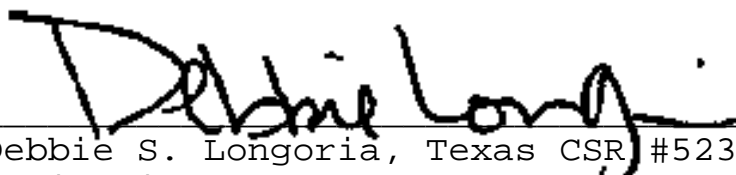
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Debbie S. Longoria, Texas CSR #5232
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